Federal Communications Commission
Washington, D.C. 20554

June 12, 2007

Dear Licensee:

1. In accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 is enclosed for your reference.)

2. If the Unit is not required to have an EEO recruitment program due to the size of its full-time workforce (employing fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you must provide only a list of the Unit's full-time employees, noted by job title and the number of hours each is regularly assigned to work per week, **and a response to question 3(e) below.** See Paragraph 4 below regarding brokers and brokered stations where there are fewer than five full-time employees.

3. **Audit Data Requested.** If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation for any information that you are unable to provide:

(a) The employment unit's two most recent EEO public file reports, described in 47 C.F.R. § 73.2080(c)(6). For any stations in the Unit that have websites, state the web addresses. If the Unit's most recent public file report is not included or linked to on any of these websites, in violation of 47 C.F.R. § 73.2080(c)(6), provide an explanation for why it is not there.

(b) For each full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in § 73.2080(c)(5)(iii). Include copies of job announcements sent to any organizations (identified separately from other sources) that have notified the Unit that they want to be notified of Unit job openings, as described in § 73.2080(c)(1)(ii).

(c) In accordance with § 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

(d) Documentation demonstrating performance of recruitment initiatives described under § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as

participation at job fairs, mentoring programs, training for staff, etc. Specify the Unit personnel involved in the recruitment initiatives. Also, provide the total number of full-time employees of the Unit and whether the population of the market of the Unit is 250,000 or more. Based upon these two factors, as explained in 47 C.F.R. §§ 73.2080(c)(2) and (e)(3), determine and state whether the Unit is required to perform two or four initiatives within a two-year period.

(e) Disclose any pending or resolved complaints filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues; (2) the complainant and other persons involved; (3) the date of its filing; (4) the court or agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. All complaints must be reported, regardless of their status or disposition.

(f) In accordance with § 73.2080(b), from March 10, 2003 (or from the first day of the Station's current license term if after that date), until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with § 73.2080(c)(3), from March 10, 2003 (or from the first day of the Station's current license term if after that date), until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result of such analysis.

(h) In accordance with § 73.2080(c)(4), from March 10, 2003 (or from the first day of the Station's current license term if after that date), until the date of this letter, describe the Unit's efforts to analyze periodically measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If you are a religious broadcaster and any of your full-time employees are subject to a religious qualification as described in § 73.2080(a) of our rules, please indicate this in your response to this letter and provide data as applicable to your EEO program**.** For example, for full-time hires subject to a religious qualification, the Licensee needs to keep only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree. No other records would be required for those hires. If five or more full-time positions are not subject to a religious qualification, the Licensee must keep all records for such hires and complete the initiatives required under § 73.2080(c)(2). Otherwise, a religious broadcaster would not be required to perform these initiatives.

4. **Time Brokerage.**

(a) **Brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter to provide us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and answer to question 3(e) above, you must

immediately forward a copy of this letter to the broker under each such agreement.

(b) **Brokers.** If you are the broker of any Unit station referenced above, you are required to supply the Commission with the information requested herein regarding *your* full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. *See* 47 C.F.R. § 73.2080(f)(3). If your employees at your own station(s), combined with your employees at the station(s) you are brokering, total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), **and a response to question 3(e).**

5. **Procedures.** All responses must be postmarked within 30 calendar days of the date of this letter. The response must be in the form of a statement signed by an officer, partner or other principal of the Station licensee or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. Send the response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, DC 20554. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; see also 47 C.F.R. § 1.17), and/or revocation of any station license or construction permit [47 U.S. Code § 312(a)(1)], and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is also punishable by sanctions against the licensee, in accordance with 47 C.F.R. § 73.2080(g). Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450.

6. In accordance with 47 C.F.R. § 73.3526(e)(10) (for commercial stations) and 47 C.F.R. § 73.3527(e)(11) (for noncommercial educational stations), copies of which are also enclosed, you are required to place a copy of this letter and your response in the public inspection file of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

7. If our EEO random audits sent in 2006 or February 2007 included the Station, please call the EEO staff at (202) 418-1450 before responding to this letter.

Thank you for your cooperation.

Sincerely,

Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosures